



BP OIL

Donald E. Calhoun III
Environmental Remediation Management
BP Exploration & Oil Company, Inc.
4101 Post Road, P O. BOX 428
Trainer, PA 19061
(610) 364 - 8129
(610) 364 - 8191 (FAX)

January 14, 1997

VIA CERTIFIED MAIL NO. Z 074 201 972
Return Receipt Requested

Pennsylvania Department of
Environmental Protection
555 North Lane
Lee Park, Suite 6010
Conshohocken, PA 19428
Attn. Robert Day-Lewis

RE: Current Status of the
Remediation Agreement for the
former Marcus Hook Refinery

RECEIVED
PA/DC SECTION
JAN 21 1997
EPA REGION III

Dear Mr. Day-Lewis:

Please allow this letter to serve as a follow up to our meeting with the staff of the Penna. Department of Environmental Protection (the Department) and the U.S. EPA Region III on May 31, 1996. This letter provides an update regarding current site activities and the status of the Description of Current Conditions (DCC) report for the *former* Marcus Hook Refinery.

Since our last meeting BP Oil has solicited bids, received proposals and selected a consultant to prepare a DCC report that consolidates all existing site data [geologic, hydrologic, physical, chemical, etc.]. This has involved the consolidation of all environmental site data, the preparation of a scope of work and the solicitation and selection of a hydrogeologic contractor for the preparation of the DCC Report.

Based on the amount of data generated to date, the complexity of the facility, the need to understand the hydrogeologic conditions, and the anticipation of future data, BP Oil has included in the program, the design and development of a Geographic Information System (GIS). BP Oil believes that the development of a GIS is essential to data management and mapping at the site.

BP Oil solicited proposals and awarded the contract for the DCC in mid-December. The first task in preparing the DCC is the design of the GIS database. To do this, BP Oil has consolidated over 200 geotechnical boring logs, over 300 shallow geoprobe sample locations, soil gas data, and the results from a comprehensive Hydrogeologic Investigation conducted in 1991. Additionally all data from contemporaneous studies, such as the 175 Tank Site Investigation, 158 Tank Site Investigation, the Surface Impoundment Closure, and sampling of the 42 onsite monitoring wells, will be included.

The GIS will be designed to incorporate future site data, allowing BP Oil to utilize the data sorting and mapping capabilities of the GIS system in generating the DCC, evaluating data needs for future studies and generating subsequent reports. At this time, BP Oil anticipates that the design and data input portion of the GIS development will be complete by the end of the second quarter 1997 (2Q). The DCC report will be prepared once the GIS is finalized. BP Oil expects to have a final DCC report by May 1997.

In addition to the GIS and DCC, BP Oil has been continuing with other projects at the refinery. The following provides a current status for those projects.

Current Activities

1. **RCRA Closure - Interim Status Surface Impoundment (SI)** - BP has been working with the Department on closure. BP Oil is currently engaged in the following activities:

- Closure documents submitted May 1996, the Department conducted an inspection in June 1996.
- BP Oil conducted Department requested backfilling activities in August 1996. Additional fill is required.
- Prepared a scope of work, solicited bid and selected a contractor to survey the SI and prepare a plan for backfilling the impoundment in September 1996.
- Completed surveying and engineering design for create a grading and drainage plan for the SI in November 1996. Conducted bid walk with contractors in late December 1996.
- Expect to award construction contract for backfill and grading in early January.
- Prepared additional maps as clarification of the soil sampling conducted as part of the closure of the RCRA interim status surface impoundment.

2. **RCRA Closure - Part B permitted, Hazardous Waste Storage Building (HWSB)**.

- Submitted Certification of closure documentation for the HWSB.
- Submitted request for revocation of the Part B Permit and reduction of the bond.
- Conducted additional voluntary wipe sampling of the HWSB [sampling not required by closure plan].
- Sampling results to be submitted to the Department in a separate "Closure Performance Report" in January 1997.
- Met with the Department to conduct inspections of the HWSB in June 1996 and January 1997

3. Voluntary wetlands restoration program - This area was subject to restoration in 1995. Approval of the restoration work was received in January 1996.
- Submitted a request to the US Army Corps of Engineers (COE) for a "Jurisdictional Determination" (JD) for the former scrap yard area.
 - US Army Corps re-inspected the area in November. Renewed request for JD issued in December 1996.
 - Final JD letter expected from COE in 1Q 1997.
 - Completed a study to demonstrate that the soils that were reused on site, meet Department standards in April 1996.
4. Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) - Following the Visual Site Inspection (VSI) conducted jointly by the Department and USEPA Region III, in April 1996, two categories of SWMUs and AOCs remained: a) those sites that have been addressed (cleaned up) by BP Oil following the 1991 RCRA Facility Assessment (RFA) [i.e. previous action], and, b) those sites where minor clean up was requested by the Department following the VSI. The following lists the actions BP Oil has taken to address these two categories.

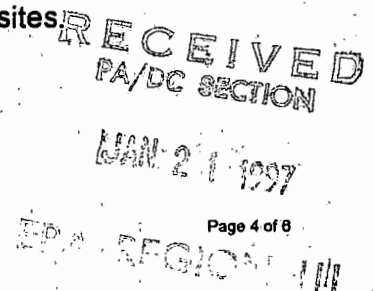
A) Previous Action

- Collected laboratory data, photos, waste records, MSDS sheets, etc. as requested by the Department (Snowden) regarding previous clean up.
- Preparing a report to document the clean up of several SWMUs as requested by the Department. Final in 1Q 1997.
- Sites include: Marcus Hook Guard Basin (SWMU No. 2), Stoney Creek Guard Basin (SWMU No. 3), Contaminated Soil Pile (SWMU No. 4, AOC G), Former Surge Basin (SWMU No. 55), Fill Area (SWMU No. 79), and, Old Drum Storage Area (SWMU No. 82).

B) Actions resulting from VSI

- Prepared a scope of work for clean up of 5 SWMU/AOC areas identified in Snowden notes from VSI, including: Area #3 Process Trenches (AOC H/SWMU No. 39), Sulfur Recovery Area/Loading Rack Spill Area (SWMU No. 90), Slop Oil sump (AOC D), Storage Tank 157 (AOC O/SWMU No. 63), API Separator (SWMU No. 5).
- Selected an oversight engineer and contractor for clean up of 5 SWMUs.
- Commenced work on the clean up in September 1996. Notified the Department.
- Completed clean up work in late October 1996.
- Received draft clean-up/closure report from oversight engineer in December 1996. Anticipate final document in January 1997.

5. Light Non-Aqueous Phase Liquids (LNAPL) Recovery Sumps and Monitoring Wells - BP continues to collect LNAPL from sumps and wells. This carries forward previous refinery practice to collect LNAPL, as it was discovered at the refinery. In addition to the normal recovery, BP Oil completed the following activities.
- Completed desk top study of the West Tank/Lube Plant Area to map underground piping, utilities, etc.
 - Conducted an inventory, clean-out and testing of former sumps across the refinery.
 - Conducted LNAPL recoverability tests on new locations.
 - Instituted LNAPL recovery programs as sumps are identified and quantified.
6. 158 Tank Release - This tank had a release of No. 2 oil in November 1995.
- Completed 'Site Characterization Report' and submitted it to the Department (June 1996).
 - Completed a proposed surface soil clean up at the tank dike area, pursuant to the plan submitted to the department in August 1996.
 - Received verbal acceptance of Site Characterization Report and interim corrective actions from the Department.
7. 175 Tank Release - This tank had a failure in November 1994. Interim corrective action was initiated by BP Oil in December 1994.
- Continuing the NAPL recovery program as designed in Site Characterization Report, June 1995.
 - Selected a contractor to review NAPL recovery system.
 - Conducting maintenance and upgrades to NAPL recovery system.
8. TOSCO Baseline Assessment - BP and TOSCO have collected ground-water, selected soil and sediment samples from over 400 locations across the refinery to identify baseline conditions.
- Data will be included in the GIS system and incorporated into the DCC report.
9. Non-Hazardous Waste - BP Oil has disposed of non-hazardous wastes generated before the sale to Tosco. All wastes were handled pursuant to the BP Oil MHR waste management program and in accord with PADEP's regulations. Wastes include:
- concrete and asphalt
 - soil from SWMU excavation, tank clean ups and other sites
 - wood
 - oily debris

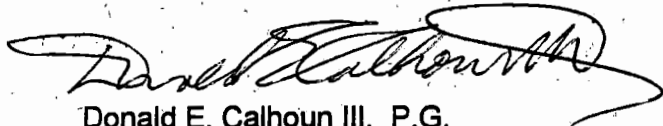


As we discussed in our May meeting, BP Oil plans to complete and submit the DCC report to both the Department and the USEPA Region III prior to scheduling another meeting. As indicated above, we anticipate completion and submittal of the report near the middle of the second quarter (2Q) of 1997. Therefore, it appears as though our next meeting could be in late 2Q 1997. Again we appreciate your patience as we work through this process and welcome any comments you may have.

Finally, as discussed in our meeting BP Oil would like to review examples of previous "ACT 2" type consent agreements between the Department and the regulated community. Will you be so kind as to provide us with examples of previous agreements that could serve as a basis for our discussions?

Again BP Oil looks forward to working with you to define a pathforward regarding the *former* Marcus Hook Refinery. Please contact me if I can provide any additional information. My new telephone number is at (610) 364 - 8129.

Sincerely,



Donald E. Calhoun III, P.G.
Senior Environmental Engineer

cc: FILE 96
J. R. Rocco
S. L. Sharp
M. G. Darr
J. L. Litner
D. L. Bell

VIA CERTIFIED MAIL

United States Environmental
Protection Agency - Region III
841 Chestnut Building
Philadelphia, PA 19107
Attn.: Paul Gotthold

VIA Regular MAIL

United States Environmental
Protection Agency - Region III
841 Chestnut Building
Philadelphia, PA 19107
Attn.: Stephen Hon Lee (3HW80)

RECEIVED
PA/BC SECTION
JAN 21 1997
EPA REGION III

VIA Regular MAIL

Pennsylvania Department of
Environmental Protection
Bureau of Waste Management
Lee Park Suite 6010
555 North Lane
Conshohocken, PA 19428
Attn.: Walter Payne

Pennsylvania Department of
Environmental Protection
Bureau of Waste Management
Lee Park Suite 6010
555 North Lane
Conshohocken, PA 19428
Attn.: Larry Lunsik

Pennsylvania Department of
Environmental Protection
Bureau of Waste Management
Lee Park Suite 6010
555 North Lane
Conshohocken, PA 19428
Attn.: Dan Snowden

Pennsylvania Department of
Environmental Protection
Bureau of Waste Management
Lee Park Suite 6010
555 North Lane
Conshohocken, PA 19428
Attn.: Andy Hartzell

RECEIVED
PA/DC SECTION

JAN 21 1997

EPA REGION 1